

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
PRESENT: HON. CHARLES L. BRIEANT

-----X
UNITED STATES OF AMERICA,

ORDER

07 Cr. 387(CLB)

-against-

PLUTARCO ANGULO-AGUIRRE,

Defendant.

-----X
UPON the application of Michael F. Keesee, Esq., made the 27th day of August, 2007, and upon all other papers and proceedings had and held herein, it is hereby

ORDERED that Michael F. Keesee, Esq., counsel for the defendant, PLUTARCO ANGULO-AGUIRRE, is hereby authorized to engage and employ the services of an investigator to provide investigative services on behalf of the defendant in an amount not to exceed \$1,000.00, at a cost to be borne by the United States of America pursuant to the Criminal Justice Act, to be paid upon a sworn statement of said investigator specifying the time expended, services rendered, expenses incurred and which shall be reimbursed and compensated in the same manner usually applicable to vouchers under the Criminal Justice Act.

SO ORDERED

^{ENTER}
White Plains, N.Y.
September 4, 2007

Charles Brieant
HON. CHARLES L. BRIEANT
JUDGE OF DISTRICT COURT
U.S. District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
UNITED STATES OF AMERICA,

-against-

07Cr.387(CLB)
AFFIDAVIT

PLUTARCO ANGULO-AGUIRRE,
Defendant.

-----x
STATE OF NEW YORK)
: ss.:
COUNTY OF WESTCHESTER)

MICHAEL F. KEESEE, being duly sworn, deposes and says:

1. I am counsel for the above defendant, Plutarco Angulo-Aguirre having been assigned pursuant to the Criminal Justice Act, and I make this affidavit in support of this ex parte proceeding for an order authorizing counsel to obtain investigative services on behalf of the defendant.

2. By indictment dated 2007, this defendant is charged with violations of Title 18, United States Code, Section 1201(a)(1) and 2, Title 18 United States Code, Section 1951 (b) (1) and Section 1951(b)(3). Upon information and belief, investigative work must be performed in order to effectively represent this defendant, whom I believe will be proceeding to trial. I believe that there are several people who have relevant firsthand information about the offenses alleged in the complaint. There are potential witnesses in the area that need to be interviewed in order to properly prepare for trial. I also anticipate the need for photographs and exhibits to be prepared for trial and witnesses to be subpoenaed. It is essential that the Court authorize funds for an investigator so that these witnesses can be contacted and other necessary work performed so that the defendant can receive a complete defense.

4. Counsel has completed as much independent investigation as possible, and now requires the assistance of a professional investigator.

5. Counsel feels that the statutory limit will be necessary in order to fully and properly prepare Mr. Plutarco Angulo-Aguirre's defense. Accordingly, counsel requests that this Court approve the funds in the amount of \$1,000.00, which are needed to conduct the necessary work.

6. The defendant is without funds and is not in a financial position to pay for the needed investigatory work. He is detained without bail.

7. Counsel is attempting to make this application in a timely manner and anticipates no delay of any proceeding by reason of this request.

WHEREFORE, your deponent respectfully requests that the Court enter an order authorizing counsel to obtain on behalf of the defendant investigative services to be paid directly to the investigator in the form prescribed by statute, and granting such other and further relief as to the Court may seem just and proper.

Michael F. Keesee
MICHAEL F. KEESEE (8957)

Sworn to before me this
~~day~~ of August 27, 2007.

[Signature]
Notary Public

